

## UNITED STATES DISTRICT COURT

for the  
Western District of Washington

In the Matter of the Search of )

Information associated with One (1) Target )  
Accounts/Identifiers, for Investigation of 21 )  
U.S.C. § 841 and Other Offenses )

Case No. MJ23-505

## APPLICATION FOR A SEARCH WARRANT AND PEN-TRAP ORDER

I, a federal law enforcement officer or an attorney for the government, request a search warrant and pen-trap order, and state under penalty of perjury that I have reason to believe that on the person or property described in Attachments A, located in Western District of Washington, there is now concealed property and evidence described in Attachment B. This Court has authority to issue this warrant under 18 U.S.C. §§ 2703(c)(1)(A) and 2711(3)(A) and Federal Rule of Criminal Procedure 41.

The basis for the search under Fed. R. Crim. P. 41(c) is (*check one or more*):

- ☐ evidence of a crime;  
☐ contraband, fruits of crime, or other items illegally possessed;  
☐ property designed for use, intended for use, or used in committing a crime;  
☒ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

*Code Section*  
 21 U.S.C. §§ 841(a)(1), 846

*Offense Description*  
 Possession with intent to distribute, and the distribution of, controlled substances; conspiracy to distribute controlled substances

The application is based on the facts set forth in the attached affidavit, which is incorporated herein by reference with all attachments and exhibits. Pursuant to 18 U.S.C. § 3123(a)(1), Exhibit 1 to the affidavit includes a certification from an attorney from the government that the requested information is relevant to an ongoing criminal investigation.

☒ Delayed notice of 90 days, to January 11, 2024, is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

Pursuant to Fed. R. Crim. P. 41, this warrant is presented by:

☒ by reliable electronic means; or ☐ telephonically recorded



*Applicant's signature*

Christopher VandenBos, DEA Task Force Officer

*Printed name and title*

- ☐ The foregoing affidavit was sworn before me and signed in my presence, or  
☒ The above-named officer provided a sworn statement attesting to the truth or the foregoing affidavit by telephone

Date: October 13, 2023



*Judge's signature*

City and state: Bellingham, Washington

United States Magistrate Judge Paula McCandlis

*Printed name and title*

**ATTACHMENT A**

**Property to Be Searched and Subscriber/Subject Information**

1. Records and information associated with the cellular phone assigned call number:

a. (218) 821-4680 (**Target Telephone 6 or TT6**), whose service provider is Verizon, a wireless telephone service provider. Verizon is headquartered at 180 Washington Valley Rd, Bedminster, NJ 07921. Investigators believe that **TT6** is being used by a “person to be arrested” within the meaning of Federal Rule of Criminal Procedure 41(c)(4) .

The identity of the person who is the subject of the criminal investigation is Natasha Halani PARKHILL.

2. The Target Cell Phone.

3. The property to be searched includes: (i) any instrument to which the listed target telephone number was assigned within the last 30 days, and that now has been assigned a changed telephone number, (ii) any changed telephone number assigned to an instrument now bearing the same unique identifying number (such as an IMSI, ESN, MSID, or IMEI) as the telephone number listed above, or that was bearing the same unique identifying number as the telephone number listed above, at any point within the last 30 days, (iii) any changed unique identifying number subsequently assigned to the same telephone number, or (iv) any additional changed telephone number and/or unique identifying number, whether the changes occur consecutively or simultaneously, listed to the same subscriber and wireless telephone account number as the telephone numbers listed above, within the period of disclosure authorized by this warrant.

## ATTACHMENT B

### Particular Things to be Seized

This warrant is issued pursuant to Rule 41 of the Federal Rules of Criminal Procedure, the Electronic Communications Privacy Act (ECPA), 18 U.S.C. §§ 2701-2713, and the Pen Register Act, 18 U.S.C. §§ 3121-3127. As such, this warrant authorizes the collection of subscriber records, pen-trap data, cell site data, and prospective E-911/GPS and cell site triangulation information regarding the Target Cell Phone. **This warrant does not authorize the disclosure or seizure of any tangible property or the content of any wire or electronic communication, as defined in 18 U.S.C. § 2510(8).** Accordingly, the Court finds reasonable necessity for the seizure of the data and records identified below. *See* 18 U.S.C. § 3103a(b)(2).

#### **I. Section I: Information to be Disclosed by Verizon**

1. **Subscriber/Account Information.** The following non-content information about the customers or subscribers associated with the Account listed in Attachment A:

a. Names (including subscriber names, user names, and screen names);

b. Addresses (including mailing addresses, residential addresses, business addresses, and e-mail addresses);

c. Local and long distance telephone connection records April 12, 2023, through the present;

d. Records of session times and durations, and the temporarily assigned network addresses (such as Internet Protocol (“IP”) addresses) associated with those sessions April 12, 2023, through the present;

e. Length of service (including start date) and types of service utilized;

f. Telephone or instrument numbers (including MAC addresses, Electronic Serial Numbers (“ESN”), Mobile Electronic Identity Numbers (“MEIN”), Mobile Equipment Identifiers (“MEID”), Mobile Identification Numbers (“MIN”), Subscriber Identity Modules (“SIM”), Mobile Subscriber Integrated Services Digital

1 Network Numbers (“MSISDN”), International Mobile Subscriber Identity Identifiers  
2 (“IMSI”), or International Mobile Equipment Identities (“IMEI”);

3 g. Other subscriber numbers or identities (including the registration  
4 Internet Protocol (“IP”) address); and

5 h. Means and source of payment for such service (including any credit  
6 card or bank account number) and billing records.

7 **2. Pen Register/ Trap and Trace Data and Associated Subscriber Records**  
8 **to Be Provided for a Period of 45 Days from the date of this warrant.**

9 a. Verizon shall install and monitor pen-trap devices to record, decode,  
10 and/or capture dialing, routing, addressing, and signaling information associated with each  
11 communication to or from the Target Cell Phone including the date, time, and duration of  
12 the communication, and the following, without geographic limit and without notice to the  
13 subscriber:

14 (i) IP addresses associated with the cell phone device or devices  
15 used to send or receive electronic communications;

16 (ii) Any unique identifiers associated with the cell phone device or  
17 devices used to make and receive calls with the cell phone number described in Attachment  
18 A, or to send or receive other electronic communications, including the ESN, MEIN, IMSI,  
19 IMEI, SIM, MSISDN, or MIN;

20 (iii) IP addresses of any websites or other servers to which the cell  
21 phone device or devices connected; and

22 (iv) Source and destination telephone numbers and email  
23 addresses.

24 b. On a 24-hour-a-day basis, for the duration of the authorized pen-trap  
25 devices, Verizon shall provide the following records for those subscribers whose identifiers  
26 are obtained pursuant to the use of the pen-trap devices: published or non-published  
27 subscriber names and addresses, including billing addresses.

1           **3. Historical Cell Site Location Information.**

2           a. All records and other information (**not including the contents of**  
3 **communications**) relating to wire and electronic communications sent or received by the  
4 Account from April 12, 2023 through the present, including:

5                   i. the date and time of the communication, the method of the  
6 communication, and the source and destination of the communication (such as the source  
7 and destination telephone numbers (call detail records), email addresses, and IP addresses);  
8 and

9                   ii. historical cell site information regarding the cell tower and  
10 antenna face (also known as “sectors”) through which the communications were sent and  
11 received. This information is to be provided irrespective of the application, name, or report  
12 utilized by Verizon. Accordingly, this information includes the following data sets to the  
13 extent that they are collected by Verizon: RTT, PLU, NELOS, TDOA, PCMD,  
14 LOCDBOR, EVDO, True Call, ALULTE, and Timing Advance.

15           b. The physical address and coverage maps of cell towers used by the  
16 Target Cell Phone.

17           **4. Prospective Cell Site Location Information.**

18           a. All information about the location of the Target Cell Phone described  
19 in Attachment A for forty-five days, during all times of day and night. This information  
20 includes: precise location information, as well as all data about which “cell towers” (i.e.,  
21 antenna towers covering specific geographic areas) and “sectors” (i.e., faces of the towers)  
22 received a radio signal from the cellular telephone(s) or account(s) described in Attachment  
23 A. This information also includes the following data sets to the extent that they are collected  
24 by Verizon: RTT, PLU, PCMD, LOCDBOR, EVDO, True Call, ALULTE, and Timing  
25 Advance.

26           b. The physical address and coverage maps of cell towers used by the  
27 Target Cell Phone.  
28

1           **5. Prospective E-911/GPS and Cell Site Triangulation Information.**

2           a. All information about the location of the Target Cell Phone described  
3 in Attachment A for a period of 45 days, during all times of day and night. This information  
4 includes: all available E-911 Phase II data, GPS data, latitude-longitude data, and other  
5 precise location information, as well as all data about which “cell towers” (i.e., antenna  
6 towers covering specific geographic areas) and “sectors” (i.e., faces of the towers) received  
7 a radio signal from the cellular telephone(s) or account(s) described in Attachment A.

8           b. The physical address and coverage maps of cell towers used by the  
9 Target Cell Phone.

10           To the extent that the location information described in the previous paragraphs  
11 (hereinafter, “Location Information”) is within the possession, custody, or control of  
12 Verizon, Verizon is required to disclose the Location Information to the government  
13 pursuant to this warrant. In addition, pursuant to 18 U.S.C. §§ 3123(b)(2) and 3124(a)-(b),  
14 Verizon must furnish the government all information, facilities, and technical assistance  
15 necessary to accomplish the collection of the Location Information unobtrusively and with  
16 a minimum of interference with Verizon’s services. The government shall compensate  
17 Verizon for reasonable expenses incurred in furnishing such facilities or assistance.

18           **II. Section II: Information to Be Seized by the Government**

19           6. All information described above in Section I that will assist in arresting  
20 Natasha Halani PARKHILL, who was charged with violating Conspiracy to Distribute  
21 Fentanyl and Possession of Fentanyl with Intent to Distribute, all in violation of 21 USC  
22 §§ 841(a)(1) and 846, and is the subject of an arrest warrant issued on April 12, 2023, and  
23 is a “person to be arrested” within the meaning of Federal Rule of Criminal Procedure  
24 41(c)(4).

25           7. All non-content subscriber/account information provided pursuant to 18  
26 U.S.C. § 2703(c).

27           8. All non-content dialing, routing, addressing, and signaling information  
28 provided pursuant to 18 U.S.C. §§ 3121-3127.

1           9.     Location Information regarding the Target Cell Phone.

2           Law enforcement personnel (who may include, in addition to law enforcement  
3 officers and agents, attorneys for the government, attorney support staff, agency personnel  
4 assisting the government in this investigation, and outside technical experts under  
5 government control) are authorized to review the records produced by Verizon in order to  
6 locate the things particularly described in this Warrant.

# AFFIDAVIT IN SUPPORT OF AN APPLICATION FOR A SEARCH WARRANT AND PEN-TRAP ORDER

STATE OF WASHINGTON           )  
  )           SS  
COUNTY OF WHATCOM          )

I, Christopher L. VandenBos being first duly sworn, hereby depose and state as follows:

# INTRODUCTION

## Application for a Tracking Warrant for Target Cell Phone

1. I make this affidavit in support of an application for search warrants under Federal Rule of Criminal Procedure 41 and 18 U.S.C. §§ 2703(c)(1)(A) for information about the location of the following cellular telephone(s) (hereafter, the “**Target Telephone**”):

a. **Target Telephone 6 (TT6)**, assigned call number (218) 821-4680, whose service provider is Verizon, a wireless telephone service provider. Verizon is headquartered at 180 Washington Valley Rd, Bedminster, NJ 07921. **TT6** is described herein and in Attachment A, and the location information to be seized is described herein and in Attachment B. Investigators believe that **TT6** is being used by a “person to be arrested” within the meaning of Federal Rule of Criminal Procedure 41(c)(4).

## ECPA

2. The Court has jurisdiction to issue the proposed warrants under the Electronic Communications Privacy Act (ECPA), 18 U.S.C. §§ 2701-2713, because it is a “court of competent jurisdiction” as defined in 18 U.S.C. § 2711. Specifically, the Court is the Western District of Washington, a district court of the United States that has jurisdiction over the offense being investigated, *see* 18 U.S.C. § 2711(3)(A)(i).

## Pen Register Act

3. Because this warrant seeks the prospective collection of information that falls within the statutory definitions of information collected by a “pen register” and/or “trap and trace device,” *see* 18 U.S.C. § 3127(3) & (4), the requested warrants are designed to comply with the Pen Register Act, 18 U.S.C. §§ 3121-3127.



1           4.       The Court has jurisdiction to issue the requested pen-trap orders because it is  
2 a “court of competent jurisdiction” under 18 U.S.C. § 3122(a)(2). Specifically, the Court  
3 is a district court of the United States that “has jurisdiction over the offense being  
4 investigated.” 18 U.S.C. § 3127(2)(A)(i).

5           5.       This application includes all the information required by the Pen Register  
6 Act. *See* 18 U.S.C. §§ 3122(b) & 3123(a)(1). Namely, Exhibit 1 to this application is a  
7 certification from Assistant United States Attorney Stephen Hobbs that (1) identifies the  
8 Drug Enforcement Administration as the law enforcement agency conducting the  
9 investigation and (2) certifies the information likely to be obtained is relevant to an ongoing  
10 criminal investigation being conducted by that agency. 18 U.S.C. § 3122(b). The Assistant  
11 United States Attorney is an “attorney for the government” as defined in Rule 1(b)(1) of  
12 the Federal Rules of Criminal Procedure.

13           6.       A “pen register” is “a device or process which records or decodes dialing,  
14 routing, addressing, or signaling information transmitted by an instrument or facility from  
15 which a wire or electronic communication is transmitted.” 18 U.S.C. § 3127(3). A “trap  
16 and trace device” is “a device or process which captures the incoming electronic or other  
17 impulses which identify the originating number or other dialing, routing, addressing, and  
18 signaling information reasonably likely to identify the source of a wire or electronic  
19 communication.” 18 U.S.C. § 3127(4).

20           7.       In the traditional telephone context, pen registers captured the destination  
21 phone numbers of outgoing calls, while trap and trace devices captured the phone numbers  
22 of incoming calls. Similar principles apply to other kinds of wire and electronic  
23 communications such as emails, text messages, connection logs, and data transfers. The  
24 prospective location data sought in this application constitutes “dialing, routing,  
25 addressing, and signaling information” covered by the Pen Register Act. Accordingly, the  
26 requested warrants will record, decode, and/or capture dialing, routing, addressing, and  
27 signaling information associated with the **Target Telephone** without geographic limit.  
28

1           8.     The United States further requests, pursuant to 18 U.S.C. §§ 3123(b)(2) and  
2 3124(a)-(b), that the Court order, through Attachment B of the requested warrants that T-  
3 Mobile, Sprint, AT&T, Verizon, and any other person or entity providing wire or electronic  
4 communication service in the United States whose assistance may facilitate execution of  
5 this warrant furnish, upon service of the warrant, information, facilities, and technical  
6 assistance necessary to install the pen/trap, including installation and operation of the pen-  
7 trap unobtrusively and with minimum disruption of normal service. Any entity providing  
8 such assistance shall be reasonably compensated by the Drug Enforcement Administration,  
9 pursuant to 18 U.S.C. § 3124(c), for reasonable expenses incurred in providing facilities  
10 and assistance in furtherance of the warrant.

11           9.     This is the **first** application in this judicial district for a search warrant  
12 authorizing disclosure of the above information for **Target Telephones 6** in connection  
13 with this investigation.

14           10.    **Through this application, the United States does not request and does**  
15 **not seek to obtain the contents of any communications, as defined in 18 U.S.C.**  
16 **§ 2510(8).**

#### 17                                   AGENT BACKGROUND

18           11.    I, Christopher L. VandenBos, am an “investigative or law enforcement  
19 officer of the United States” within the meaning of Title 18, United States Code, Section  
20 2510(7) and a “general authority Washington peace officer” within the definition of  
21 RCW 10.93.020. Specifically, I am a commissioned Sheriff’s Deputy with the Whatcom  
22 County Sheriff’s Office. I have been employed by the Whatcom County Sheriff’s Office  
23 since June 2015. In that capacity, I investigate violations of the Revised Code of  
24 Washington (RCW). In January 2019, I assumed the role of a Narcotics Detective with  
25 the Whatcom Gang and Drug Task Force, with the focus of my responsibilities including  
26 the investigation of mid to upper-level drug traffickers.  
27  
28

1           12. I am also a Task Force Officer with the Drug Enforcement Administration  
2 (“DEA”), assigned to the Bellingham, Washington Resident Office. In that capacity, I  
3 investigate violations of the Controlled Substances Act (Title 21, United States Code,  
4 Section 801, *et seq.*). I have been assigned as a Task Force Officer with the DEA since  
5 January 2019. During my time conducting investigations with the DEA, I have written  
6 and sworn to multiple federal and state search warrants and orders related to the  
7 installation of pen registers, trap and trace, and real-time location information for mobile  
8 devices. I have written multiple state and federal search warrants for data stored by social  
9 media platforms, and am familiar with the technologies used by Facebook, Instagram,  
10 Snapchat, Google, and other companies, and how it relates to tracking an individual’s  
11 movement, either live or historical.

12           13. I have completed the Undercover Techniques and Survival for Narcotics  
13 Officers School hosted by the Western Regional Counterdrug Training Center, a forty-  
14 hour Criminal Investigations Using Cellular Technologies course hosted in Las Vegas,  
15 Nevada, a twenty-four hour Fugitive Mission Planning and Cellular Investigative  
16 Techniques course hosted in Bellingham, Washington, a forty-hour DEA Task Force  
17 Officer School hosted in Quantico, Virginia, and other training courses related to criminal  
18 street gangs, narcotics trafficking, electronic surveillance, money laundering, and  
19 fentanyl-related overdose deaths. I have completed hundreds of hours of law enforcement  
20 related training, to include investigatory techniques, surveillance, evidence collection,  
21 cell phone technology, and other topics.

22           14. As a Whatcom County Sheriff’s Office Detective, I have participated in  
23 multiple death investigations, including homicide, overdose, and natural death  
24 investigations. I have participated in fugitive operations spanning multiple states, and  
25 have used my training and experience as it relates to electronic evidence to capture  
26 wanted subjects who were fleeing from law enforcement.  
27  
28

1           15. Based on my training and experience, I have become familiar with the  
2 techniques and methods used by drug traffickers to distribute controlled substances, their  
3 use of vehicles, their use of cellular phones and other electronic communication devices  
4 to facilitate their trafficking activity, and the methods used to conceal and launder the  
5 proceeds of drug trafficking. I have participated in hundreds of hours of surveillance on  
6 narcotics traffickers. I have examined narcotics related pay/owe ledgers, supplier lists,  
7 and cell phone content, and understand how they are used in relation to drug sales and  
8 trafficking. During the course of my employment, I have served search warrants and  
9 conducted narcotics-related interviews in Washington and other states, and have  
10 discussed drug trafficking and money laundering trends with members of federal and  
11 state law enforcement from across the United States, as well as those working in other  
12 countries.

13           16. I have experience acting in an undercover capacity. I have purchased  
14 controlled substances such as fentanyl-laced pills, fentanyl-laced powder, cocaine,  
15 heroin, and methamphetamine while acting in an undercover capacity. While acting in an  
16 undercover role, I have arranged narcotics transactions, discussed counter-surveillance  
17 methods to avoid law enforcement, and discussed prices, quantity, and quality of various  
18 controlled substances.

19           17. I have attended a course instructed by the Canadian Royal Mounted Police  
20 (RCMP) Clandestine Laboratory Enforcement and Response team, which discussed  
21 topics on synthetic drug manufacturing, including information regarding fentanyl in  
22 powder and pill form. During that training, I participated in a pill encapsulating  
23 demonstration using a pill press and other equipment.

24           18. In the year 2014, I obtained a Bachelor of Arts (BA) from Western  
25 Washington University in Sociology, with an emphasis in Criminology. During that time,  
26 I completed research courses involving Mexico-based drug trafficking networks,  
27 statistics, and data analytics. I also obtained a minor degree in Spanish Language.  
28

19. I speak Spanish at the conversational level. I have used Spanish to interview confidential informants, witnesses, and suspects during the course of state and federal narcotics investigations. In my role as a Task Force Officer with the Drug Enforcement Administration, I have participated in Title III wiretap investigations, and have monitored live phone intercepts between Spanish-speaking drug traffickers. While monitoring these phone intercepts, I have spoken with certified Spanish translators, who have further explained common slang terms, expressions, and code words used by drug traffickers for narcotics-related language and terms.

20. I have participated, both as case agent and in supporting roles, in multiple state and federal investigations which have led to convictions. This Affidavit is based on information I have gained from my own investigation, personal observations, training and experience, as well as information related to me by other detectives, investigators and police officers through oral and written reports. This Affidavit is meant to establish probable cause; therefore, I have not included every fact known to me at this time. I have reviewed and am familiar with the investigative file in this matter.

21. Based on the facts set forth in this affidavit, there is probable cause to believe that **TT6** is being used by a “person to be arrested” within the meaning of Federal Rule of Criminal Procedure 41(c)(4).

## SUMMARY OF INVESTIGATION

22. The United States, including the Drug Enforcement Administration (“DEA”), the Whatcom County Sheriff’s Office (“WCSO”), and the U.S. Marshals Service (“USMS”), are conducting a criminal investigation of NATASHA PARKHILL and ROBEL GEBREMEDHIN, and other known and unknown, regarding possible violations of 21 U.S.C. § 841(a)(1) and 846 (Conspiracy to Distribute Fentanyl and Possession of Fentanyl with Intent to Distribute).

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1 Issuance of Arrest Warrants

2 23. On March 30, 2023, the Honorable United States Magistrate Judge Mary  
 3 Alice Theiler signed a Criminal Complaint based on the testimony of DEA Task Force  
 4 Officer Christopher L. VandenBos. Federal warrants of arrest were subsequently issued  
 5 through United States District Court for the Western District of Washington for the  
 6 following individuals:

- 7 • Robel Sisay GEBREMHEDIN for Conspiracy to Distribute Fentanyl and  
 8 Possession of Fentanyl with Intent to Distribute, all in violation of 21 USC §§  
 9 841(a)(1) and 846; Unlawful Possession of a Firearm and Carrying a Firearm  
 10 During and in Relation to a Drug Trafficking Crime, all in violation of 18 USC  
 11 §§ 922 (g)(1) and 924(c). *Case No. MJ23-145-1.*
- 12 • Mohamed Abdirisak MOHAMED for Conspiracy to Distribute Fentanyl and  
 13 Possession of Fentanyl with Intent to Distribute, all in violation of 21 USC §§  
 14 841(a)(1) and 846; Unlawful Possession of a Firearm and Carrying a Firearm  
 15 During and in Relation to a Drug Trafficking Crime, all in violation of 18 USC  
 16 §§ 922 (g)(1) and 924(c). *Case No. MJ23-145-2.*
- 17 • Abdurman AHMED for Conspiracy to Distribute Fentanyl and Possession of  
 18 Fentanyl with Intent to Distribute, all in violation of 21 USC §§ 841(a)(1) and  
 19 846. *Case No. MJ23-145-3.*
- 20 • Daniel John FAIX for Conspiracy to Distribute Fentanyl and Possession of  
 21 Fentanyl with Intent to Distribute, all in violation of 21 USC §§ 841(a)(1) and  
 22 846. *Case No. MJ23-145-4.*
- 23 • Natasha PARKHILL for Conspiracy to Distribute Fentanyl and Possession of  
 24 Fentanyl with Intent to Distribute, all in violation of 21 USC §§ 841(a)(1) and  
 25 846. *Case No. MJ23-145-5.*
- 26 • Matthew ANDERSON for Conspiracy to Distribute Fentanyl and Possession  
 27 of Fentanyl with Intent to Distribute, all in violation of 21 USC §§ 841(a)(1)  
 28 and 846. *Case No. MJ23-145-6.*

24 24. On March 30, 2023, investigators located and arrested Ahbdurman  
 25 AHMED in Lynnwood, WA. On March 31, 2023, investigators located and arrested  
 26 Mohamed Abdirisak MOHAMED in Bellingham, WA. On March 4, 2023, investigators  
 27 located and arrested Daniel FAIX in Bellingham, WA. On June 7, 2023, investigators

1 located and arrested Matthew ANDERSON in Bellingham, WA. Investigators were  
2 unable to locate Natasha PARKHILL or Robel GEBREMHEDIN.

3 25. On April 12, 2023, a Grand Jury sitting in the Western District of  
4 Washington returned an indictment charging the above-listed individuals – including  
5 Natasha PARKHILL – with multiple drug related counts under CR23-053-RAJ. A federal  
6 warrant was issued for Robel GEBREMHEDIN and Natasha PARKHILL’s arrest.

7 26. Investigators continue to seek the arrest of Natasha PARKHILL and Robel  
8 GEBREMHEDIN as it relates to this investigation. Investigators have received  
9 information that Robel GEBREMHEDIN has fled the country. The United States  
10 Marshal’s Service (“USMS”) is assisting the DEA in locating PARKHILL and  
11 GEBREMHEDIN.

12 27. On September 19, 2023, members of the Lummi Nation Police Department  
13 responded to 2781 Lummi Shore Road, Bellingham, Washington to investigate a suspected  
14 drug overdose. Two individuals were found at that location, both deceased from a  
15 suspected drug overdose. One of the deceased individuals was identified as Daniel  
16 WASHINGTON. A cell phone was located in the vicinity of WASHINGTON’s body. On  
17 September 26, 2023, Lummi Tribal Court Judge Randy Doucet approved a search warrant  
18 for that device, which was subsequently searched by investigators. Based on the contents  
19 of the device, it appeared to belong to WASHINGTON.

20 28. In that device, investigators found a text message thread between Daniel  
21 Washington, using phone number 425-343-7031, and the cell phone number 218-821-4680  
22 (hereinafter referred to as **Target Telephone 6** or **TT6**). The text message thread began on  
23 July 28, 2023. In the text message thread, the user of **TT6** indicated they were having  
24 surgery, and asked WASHINGTON to visit them. Investigators believe, based on the  
25 following, that **TT6** is being used by Natasha PARKHILL, who has been evading arrest  
26 while living in the state of Wyoming.

27 29. On July 31, 2023, the following exchange took place:  
28



Sender	Date/Time	Message
<b>TT6</b>	7/31/23 3:30 PM	No more meth and it should heal itself
WASHINGTON	7/31/23 4:31 PM	I am still coming
<b>TT6</b>	7/31/23 4:31 PM	I love u too I should b out in a couple days
WASHINGTON	7/31/23 4:32 PM	I hope to be omw
WASHINGTON	7/31/23 4:33 PM	Lady k says hi and she loves you. Her and Paul and Ken are here
<b>TT6</b>	7/31/23 10:01 PM	Look I really need ur help down here pls just get in the car and come on it's life or death prison or freedom rn
<b>TT6</b>	7/31/23 10:08 PM	My son's gf said he can't help me and he's listening to her and I literally have no one else here she says to go turn myself in the prisons have great medical haha wtf pls come down here pls I got no one else to call on fuck put the bag down and come one bro pls.
WASHINGTON	7/31/23 10:20 PM	Ok I'm doing my best here. I'll be coming asap. I need more work rn
<b>TT6</b>	7/31/23 10:21 PM	Fuck that pls just come on it's a loop and it's never ending u know that
<b>TT6</b>	7/31/23 10:49 PM	Qmcome on Danny pls

30. Investigators believed that PARKHILL, using **TT6**, was asking WASHINGTON to visit her and help her through a medical situation. In the subsequent thread, WASHINGTON appears to agree to visit PARKHILL. On August 6, 2023, **TT6** sent a message to WASHINGTON that read "Cheyenne motel rm 6 call me when u get here I'm going to bed".

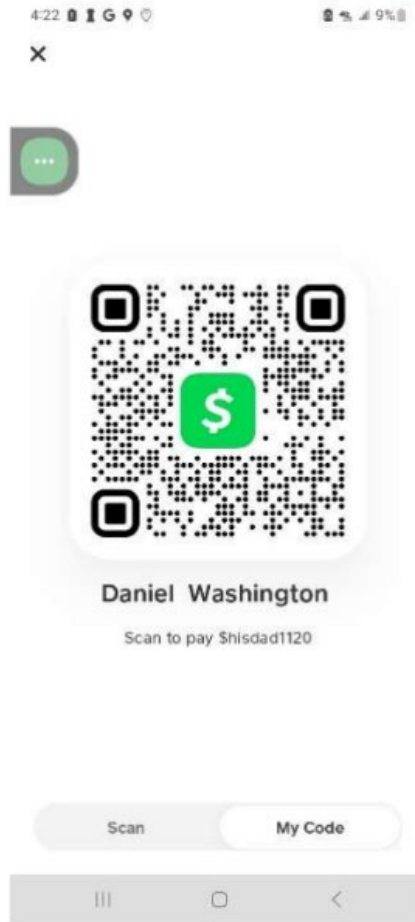
31. On September 12, 2023, at 10:23 AM, investigators saw that WASHINGTON sent the following image to **TT6**, which investigators recognized as a Cash App QR code:

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32. Investigators knew, based on their training and experience, that the Cash App QR code can be a way to identify or locate another Cash App account on the peer-to-peer payment application to make or request a payment to another user.

33. Investigators searched email records saved to the WASHINGTON's cell phone, and located the following:

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From: cash@square.com  
 Received: 9/12/2023 10:24:55 AM  
 To: eljahimurfather12@gmail.com  
 Subject: Natasha Parkhill sent you \$70

N

Natasha Parkhill  
 Payment from \$tash123tash123

\$70.00

Received

Amount	\$70.00
Destination	Cash
Identifier	#6SRT3M4
To	Daniel Washington
From	Natasha Parkhill

34. The email from cash@square.com appeared to document a payment of \$70 from a Cash App user named “Natasha Parkhill”. The email was timestamped on September 12, 2023 at 10:24 AM. Investigators believed, based on the timing between the QR code being sent and the email payment notification, that PARKHILL had sent \$70.00 to WASHINGTON over Cash App after receiving the Cash App QR code over text message.

35. While reviewing text message threads between WASHINGTON and other individuals, investigators saw that WASHINGTON made multiple references to being in Wyoming, and visiting “home girl”.

36. On October 11, 2023, investigators reviewed subscriber information related to **TT6**, which was received from Verizon in response to an administrative subpoena. Investigators observed that **TT6** had been activated on July 18, 2023. The phone was subscribed to the reseller Tracfone.

1 37. Investigators believe, based on their training and experience, that the  
2 information requested through this Application will lead to the location and eventual arrest  
3 of Natasha PARKHILL. Investigators believe, based on their training and experience, that  
4 historical location data will be of importance in locating and arresting PARKHILL.  
5 Historical location data and call detail records can assist investigators in establishing a  
6 pattern of life, common contacts, and the identifying information on individuals who may  
7 be offering criminal assistance to PARKHILL in their flight from law enforcement. These  
8 records can assist investigators in identifying additional addresses or locations where  
9 PARKHILL may be concealing themselves from law enforcement. For those reason,  
10 investigators are seeking historical records from April 12, 2023, through the present.

11 **KNOWLEDGE BASED ON TRAINING AND EXPERIENCE**

12 38. Based on my training, experience, and conversations with other experienced  
13 narcotics investigators, I have gained experience in the techniques and methods used by  
14 drug traffickers to distribute controlled substances, to include their use of cellular phones  
15 and other electronic communication devices to facilitate their trafficking activity. I know  
16 drug traffickers use cellular phones to communicate with suppliers, re-distributors, and  
17 customers. These communications via cellular phone often include discussing details  
18 around drug deals such as time and place of drug transactions, types of drugs, amounts of  
19 drugs, methods of payment for drugs, and quality of drugs sold or bought, amongst other  
20 things. I know that it is common for drug traffickers to use multiple phones as well as  
21 change phone numbers regularly. They use different telephones to help compartmentalize  
22 their drug trafficking activities. This might entail using specific phones for their personal  
23 life and other phones for drug activity. Or it might include using different phones for  
24 different individuals or aspects of their business, such as using certain phones to contact  
25 suppliers and other phones to contact redistributors. This compartmentalizing is especially  
26 common for individuals in leadership positions. Drug traffickers often try to keep the  
27 various components and organization members separate to protect parts of the organization  
28

1 from detection by law enforcement. For example, if one individual or arm of a drug  
2 trafficking organization (DTO) is arrested or seeks to assist law enforcement, that person  
3 could do less damage to the organization if the leadership limits what he or she knows  
4 about other parts of the DTO. Drug traffickers also use multiple cell phones to frustrate  
5 law enforcement interception and monitoring. Where there are multiple cell phones, law  
6 enforcement may learn of one part of the organization's activities by intercepting one  
7 phone, but they would not receive information as to the overall activities of the DTO. Thus,  
8 the use of multiple cell phones helps the survival of the overall organization.

9       39. Based on my training and experience, I know each cellular device has one or  
10 more unique identifiers embedded inside it. Depending on the cellular network and the  
11 device, the embedded unique identifiers for a cellular device could take several different  
12 forms, including an Electronic Serial Number ("ESN"), a Mobile Electronic Identity  
13 Number ("MEIN"), a Mobile Identification Number ("MIN"), a Subscriber Identity  
14 Module ("SIM"), a Mobile Subscriber Integrated Services Digital Network Number  
15 ("MSISDN"), an International Mobile Subscriber Identifier ("IMSI"), or an International  
16 Mobile Equipment Identity ("IMEI"). The unique identifiers -- as transmitted from a  
17 cellular device to a cellular antenna or tower -- can be recorded by pen-traps and indicate  
18 the identity of the cellular device making the communication without revealing the  
19 communication's content.

20       40. Based on my training and experience, I know that when a cell phone connects  
21 to a cellular antenna or tower, it reveals its embedded unique identifiers to the cellular  
22 antenna or tower, and the cellular antenna or tower records those identifiers as a matter of  
23 course. The unique identifiers -- as transmitted from a cell phone to a cellular antenna or  
24 tower -- are like the telephone number of an incoming call. They can be recorded by pen-  
25 trap devices and indicate the identity of the cell phone device making the communication  
26 without revealing the communication's content. In addition, a list of incoming and  
27 outgoing telephone numbers is generated when a cell phone is used to make or receive  
28

1 calls, or to send or receive text messages (which may include photographs, videos, and  
2 other data). These telephone numbers can be recorded by pen-trap devices and then used  
3 to identify the parties to a communication without revealing the communication's contents.

4 41. Based my training and experience, I know that a cell phone can also be used  
5 to exchange text messages with email accounts. The email addresses associated with those  
6 text messages can be recorded by pen-trap devices and then used to identify parties to a  
7 communication without revealing the communication's contents.

8 42. Based on my training and experience, I know that cellular phones can  
9 connect to the internet via a cellular network. When connecting through a cellular network,  
10 internet communications sent and received by the cellular phone each contain the same  
11 unique identifier that identifies cellular voice communications, such as an ESN, MEIN,  
12 MIN, SIM, IMSI, MSISDN, or IMEI. Internet communications from a cellular phone also  
13 contain the IP address associated with that cellular phone at the time of the communication.  
14 Each of these unique identifiers can be used to identify parties to a communication without  
15 revealing the communication's contents.

16 43. In my training and experience, I have learned that T-Mobile, Sprint, AT&T,  
17 and Verizon are companies that provide cellular telephone access to the general public. I  
18 also know that certain providers of cellular telephone service have technical capabilities  
19 that allow them to collect and generate information about the locations of the cellular  
20 telephones to which they provide service, including E-911 Phase II data (also known as  
21 GPS data or latitude-longitude data) and cell-site data (also known as "tower/face  
22 information" or cell tower/sector records). E-911 Phase II data provides relatively precise  
23 location information about the cellular telephone itself, either via GPS tracking technology  
24 built into the phone or by triangulating on the device's signal using data from several of  
25 the provider's cell towers. Cell-site data identifies the cell towers (i.e., antenna towers  
26 covering specific geographic areas) that received a radio signal from the cellular telephone  
27 and, in some cases, the "sector" (i.e., faces of the towers) to which the telephone connected.  
28

1 These towers are often a half-mile or more apart, even in urban areas, and can be 10 or  
2 more miles apart in rural areas. Furthermore, the tower closest to a wireless device does  
3 not necessarily serve every call made to or from that device. Accordingly, cell-site data is  
4 typically less precise than E-911 Phase II data.

5 44. Based on my training and experience, I know that T-Mobile, Sprint, AT&T,  
6 and Verizon can collect E-911 Phase II data about the location of the Target Telephones,  
7 including by initiating a signal to determine the location of the Target Telephones on their  
8 networks (T-Mobile, Sprint, AT&T, and Verizon) or with such other reference points as  
9 may be reasonably available.

10 45. When using a cellular connection to receive or transmit data, a cellular phone  
11 typically utilizes a cell tower to make telephone calls, send or receive text messages, send  
12 or receive emails, surf the internet, carry out application initiated data transfers, among  
13 other things.

14 46. Based on my training and experience, I know that T-Mobile, Sprint, AT&T,  
15 and Verizon can collect cell-site data about Target Telephones. Based on my training and  
16 experience, I know that for each communication (including data connections) a cellular  
17 device makes, its wireless service provider can typically determine: (1) the date and time  
18 of the communication; (2) the telephone numbers involved, if any; (3) the cell tower to  
19 which the customer connected at the beginning of the communication; (4) the cell tower to  
20 which the customer connected at the end of the communication; and (5) the duration of the  
21 communication. I also know that wireless providers such as T-Mobile, Sprint, AT&T, and  
22 Verizon typically collect and retain cell-site data pertaining to cellular devices to which  
23 they provide service in their normal course of business in order to use this information for  
24 various business-related purposes.

25 47. Different service providers use different systems, applications, and reports to  
26 collect or analyze cell site data. These systems, applications, and reports are referred to by  
27 a variety of names including, but not limited to real-time tool or "RTT" (Verizon), Periodic  
28

1 Location Updates or “PLU” (Verizon), per call measurement data or “PCMD” (Sprint),  
2 Location Database of Record or “LOCDBOR” (AT&T), EVDO, ALULTE, Timing  
3 Advance and True Call (T-Mobile/Sprint/US Cellular/GCI). RTT data, for example,  
4 estimates the approximate distance of the cellular device from a cellular tower based upon  
5 the speed with which signals travel between the device and the tower. This information can  
6 be used to estimate an approximate location range that is more precise than typical cell-site  
7 data.

8 48. Based on my training and experience, I know that wireless providers such as  
9 T-Mobile, Sprint, AT&T, and Verizon typically collect and retain information about their  
10 subscribers in their normal course of business. This information can include basic personal  
11 information about the subscriber, such as name and address, and the method(s) of payment  
12 (such as credit card account number) provided by the subscriber to pay for wireless  
13 communication service. I also know that wireless providers such as T-Mobile, Sprint,  
14 AT&T, and Verizon typically collect and retain information about their subscribers’ use of  
15 the wireless service, such as records about calls or other communications sent or received  
16 by a particular device and other transactional records, in their normal course of business.  
17 In my training and experience, this information may constitute evidence of the crimes  
18 under investigation because the information can be used to identify the Target Telephone’s  
19 user or users and may assist in the identification of co-conspirators and/or victims.

20 49. Modern cell phones allow users to switch their telephone numbers, use  
21 multiple telephone numbers on a single device, and transfer their telephone number to a  
22 different cell phone. These changes can be made with the assistance of the wireless  
23 provider or by taking actions such as changing the “SIM card” (short for “subscriber  
24 identity module card”) of a cellphone. To provide for any such changes made to the Target  
25 Telephones, Attachment A specifies that the property to be searched includes: (i) any  
26 instrument to which the listed target telephone number was assigned within the last 30  
27 days, and that now has been assigned a changed telephone number, (ii) any changed  
28



1 telephone number assigned to an instrument now bearing the same unique identifying  
2 number (such as an IMSI, ESN, MSID, or IMEI) as the telephone number listed above, or  
3 that was bearing the same unique identifying number as the telephone number listed above,  
4 at any point within the last 30 days, (iii) any changed unique identifying number  
5 subsequently assigned to the same telephone number, or (iv) any additional changed  
6 telephone number and/or unique identifying number, whether the changes occur  
7 consecutively or simultaneously, listed to the same subscriber and wireless telephone  
8 account number as the telephone numbers listed above, within the period of disclosure  
9 authorized by this warrant.

#### 10 **AUTHORIZATION REQUEST FOR TARGET TELEPHONE**

11 50. Based on the fact set forth in this affidavit, there is probable cause to  
12 conclude that violations of 21 U.S.C §841 and §846 (distribution of controlled substances  
13 and conspiracy to distribute controlled substances) have been committed by the user of the  
14 target telephone. The requested information, including prospective location information,  
15 for the target telephone(s) will help law enforcement monitor and locate the user of the  
16 target telephone, follow their movements when they are at locations that are otherwise hard  
17 for law enforcement to observe, and eventually effect an arrest. There is probable cause to  
18 believe that the use of the investigative technique described by the warrant will result in  
19 officers learning the location of the person to be arrested.

20 51. Based on the foregoing, I request that the Court issue the proposed search  
21 warrant and pen-trap order for the **Target Telephone**, pursuant to Federal Rule of Criminal  
22 Procedure 41, 18 U.S.C. § 2703(c), and 18 U.S.C. § 3123.

23 52. I further request, pursuant to 18 U.S.C. § 3103a(b) and Federal Rule of  
24 Criminal Procedure 41(f)(3), that the Court authorize the officer executing the warrant to  
25 delay notice to the subscriber or user of the Target Telephone(s) until 90 days after the  
26 collection authorized by the warrant has been completed. There is reasonable cause to  
27 believe that providing immediate notification of the warrant may have an adverse result, as  
28



1 defined in 18 U.S.C. § 2705. Providing immediate notice to the subscriber or user of the  
2 Target Telephone(s) would seriously jeopardize the ongoing investigation, as such a  
3 disclosure would give that person an opportunity to destroy evidence, change patterns of  
4 behavior, notify confederates, and flee from prosecution. *See* 18 U.S.C. § 3103a(b)(1). As  
5 further specified in Attachment B, which is incorporated into the warrant, the proposed  
6 search warrant does not authorize the seizure of any tangible property. *See* 18 U.S.C. §  
7 3103a(b)(2). Moreover, to the extent that the warrant authorizes the seizure of any wire or  
8 electronic communication (as defined in 18 U.S.C. § 2510) or any stored wire or electronic  
9 information, there is reasonable necessity for the seizure for the reasons set forth above.  
10 *See* 18 U.S.C. § 3103a(b)(2).

11 53. I further request that the Court direct Verizon to disclose to the government  
12 any information described in Attachments B that is within the possession, custody, or  
13 control of Verizon. I also request that the Court direct Verizon to furnish the government  
14 all information, facilities, and technical assistance necessary to accomplish the collection  
15 of the information described in Attachments B unobtrusively and with a minimum of  
16 interference with Verizon's services, including by initiating a signal to determine the  
17 location of the Target Telephone(s) on Verizon's network or with such other reference  
18 points as may be reasonably available, and at such intervals and times directed by the  
19 government. The agency shall reasonably compensate Verizon for reasonable expenses  
20 incurred in furnishing such facilities or assistance.

21 //

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23 //

1        54. Pursuant to 18 U.S.C. § 2703(g), the government will execute these warrants  
2 by serving the warrants on Verizon. Because the warrants will be served on T-Mobile,  
3 Verizon, who will then compile the requested records and data, reasonable cause exists to  
4 permit the execution of the requested warrant at any time in the day or night. I therefore  
5 request that the Court authorize execution of the warrant at any time of day or night, owing  
6 to the potential need to locate the **Target Telephone** outside of daytime hours.

7  
8 

9 Christopher L. VandenBos, Affiant  
10 Task Force Officer  
11 Drug Enforcement Administration  
12

13        The above-named agent provided a sworn statement to the truth of the foregoing  
14 affidavit by telephone on this 13<sup>th</sup> day of October, 2023.

15  
16 

17 HON. PAULA L. McCANDLIS  
18 United States Magistrate Judge  
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**EXHIBIT 1**

DECLARATION

I, Stephen Hobbs, declare as follows:

1. I am a duly appointed Assistant United States Attorney for the Western District of Washington, and I have primary responsibility for representing the interests of the United States herein.

2. I make this declaration in support of an application for a search warrant pursuant to Federal Rule of Criminal Procedure 41 and 18 U.S.C. § 2703(c)(1)(A) with an integrated pen-trap order pursuant to 18 U.S.C. §§ 3122 and 3123.

3. Pursuant to 18 U.S.C. § 3122(b), I certify that the Drug Enforcement Administration (“DEA”) and the U.S. Marshal’s Service (“USMS”) are the law enforcement agencies conducting the investigation in this matter and that the information likely to be obtained from the requested warrant is relevant to an ongoing criminal investigation being conducted by those agencies.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing Application is made on the basis of information officially furnished, and on that basis I verily believe such information to be true.

Executed this 13<sup>th</sup> day of October, 2023.

*s/ Stephen Hobbs*

STEPHEN HOBBS

Assistant United States Attorney

**ATTACHMENT A****Property to Be Searched and Subscriber/Subject Information**

1. Records and information associated with the cellular phone assigned call number:

a. (218) 821-4680 (**Target Telephone 6 or TT6**), whose service provider is Verizon, a wireless telephone service provider. Verizon is headquartered at 180 Washington Valley Rd, Bedminster, NJ 07921. Investigators believe that **TT6** is being used by a “person to be arrested” within the meaning of Federal Rule of Criminal Procedure 41(c)(4) .

The identity of the person who is the subject of the criminal investigation is Natasha Halani PARKHILL.

2. The Target Cell Phone.

3. The property to be searched includes: (i) any instrument to which the listed target telephone number was assigned within the last 30 days, and that now has been assigned a changed telephone number, (ii) any changed telephone number assigned to an instrument now bearing the same unique identifying number (such as an IMSI, ESN, MSID, or IMEI) as the telephone number listed above, or that was bearing the same unique identifying number as the telephone number listed above, at any point within the last 30 days, (iii) any changed unique identifying number subsequently assigned to the same telephone number, or (iv) any additional changed telephone number and/or unique identifying number, whether the changes occur consecutively or simultaneously, listed to the same subscriber and wireless telephone account number as the telephone numbers listed above, within the period of disclosure authorized by this warrant.

## ATTACHMENT B

### Particular Things to be Seized

This warrant is issued pursuant to Rule 41 of the Federal Rules of Criminal Procedure, the Electronic Communications Privacy Act (ECPA), 18 U.S.C. §§ 2701-2713, and the Pen Register Act, 18 U.S.C. §§ 3121-3127. As such, this warrant authorizes the collection of subscriber records, pen-trap data, cell site data, and prospective E-911/GPS and cell site triangulation information regarding the Target Cell Phone. **This warrant does not authorize the disclosure or seizure of any tangible property or the content of any wire or electronic communication, as defined in 18 U.S.C. § 2510(8).** Accordingly, the Court finds reasonable necessity for the seizure of the data and records identified below. *See* 18 U.S.C. § 3103a(b)(2).

#### **I. Section I: Information to be Disclosed by Verizon**

1. **Subscriber/Account Information.** The following non-content information about the customers or subscribers associated with the Account listed in Attachment A:

- a. Names (including subscriber names, user names, and screen names);
- b. Addresses (including mailing addresses, residential addresses, business addresses, and e-mail addresses);
- c. Local and long distance telephone connection records April 12, 2023, through the present;
- d. Records of session times and durations, and the temporarily assigned network addresses (such as Internet Protocol (“IP”) addresses) associated with those sessions April 12, 2023, through the present;
- e. Length of service (including start date) and types of service utilized;
- f. Telephone or instrument numbers (including MAC addresses, Electronic Serial Numbers (“ESN”), Mobile Electronic Identity Numbers (“MEIN”), Mobile Equipment Identifiers (“MEID”), Mobile Identification Numbers (“MIN”), Subscriber Identity Modules (“SIM”), Mobile Subscriber Integrated Services Digital

1 Network Numbers (“MSISDN”), International Mobile Subscriber Identity Identifiers  
2 (“IMSI”), or International Mobile Equipment Identities (“IMEI”);

3 g. Other subscriber numbers or identities (including the registration  
4 Internet Protocol (“IP”) address); and

5 h. Means and source of payment for such service (including any credit  
6 card or bank account number) and billing records.

7 **2. Pen Register/ Trap and Trace Data and Associated Subscriber Records**  
8 **to Be Provided for a Period of 45 Days from the date of this warrant.**

9 a. Verizon shall install and monitor pen-trap devices to record, decode,  
10 and/or capture dialing, routing, addressing, and signaling information associated with each  
11 communication to or from the Target Cell Phone including the date, time, and duration of  
12 the communication, and the following, without geographic limit and without notice to the  
13 subscriber:

14 (i) IP addresses associated with the cell phone device or devices  
15 used to send or receive electronic communications;

16 (ii) Any unique identifiers associated with the cell phone device or  
17 devices used to make and receive calls with the cell phone number described in Attachment  
18 A, or to send or receive other electronic communications, including the ESN, MEIN, IMSI,  
19 IMEI, SIM, MSISDN, or MIN;

20 (iii) IP addresses of any websites or other servers to which the cell  
21 phone device or devices connected; and

22 (iv) Source and destination telephone numbers and email  
23 addresses.

24 b. On a 24-hour-a-day basis, for the duration of the authorized pen-trap  
25 devices, Verizon shall provide the following records for those subscribers whose identifiers  
26 are obtained pursuant to the use of the pen-trap devices: published or non-published  
27 subscriber names and addresses, including billing addresses.

1           **3. Historical Cell Site Location Information.**

2           a. All records and other information (**not including the contents of**  
3 **communications**) relating to wire and electronic communications sent or received by the  
4 Account from April 12, 2023 through the present, including:

5                   i. the date and time of the communication, the method of the  
6 communication, and the source and destination of the communication (such as the source  
7 and destination telephone numbers (call detail records), email addresses, and IP addresses);  
8 and

9                   ii. historical cell site information regarding the cell tower and  
10 antenna face (also known as “sectors”) through which the communications were sent and  
11 received. This information is to be provided irrespective of the application, name, or report  
12 utilized by Verizon. Accordingly, this information includes the following data sets to the  
13 extent that they are collected by Verizon: RTT, PLU, NELOS, TDOA, PCMD,  
14 LOCDBOR, EVDO, True Call, ALULTE, and Timing Advance.

15           b. The physical address and coverage maps of cell towers used by the  
16 Target Cell Phone.

17           **4. Prospective Cell Site Location Information.**

18           a. All information about the location of the Target Cell Phone described  
19 in Attachment A for forty-five days, during all times of day and night. This information  
20 includes: precise location information, as well as all data about which “cell towers” (i.e.,  
21 antenna towers covering specific geographic areas) and “sectors” (i.e., faces of the towers)  
22 received a radio signal from the cellular telephone(s) or account(s) described in Attachment  
23 A. This information also includes the following data sets to the extent that they are collected  
24 by Verizon: RTT, PLU, PCMD, LOCDBOR, EVDO, True Call, ALULTE, and Timing  
25 Advance.

26           b. The physical address and coverage maps of cell towers used by the  
27 Target Cell Phone.  
28

1           **5. Prospective E-911/GPS and Cell Site Triangulation Information.**

2           a. All information about the location of the Target Cell Phone described  
3 in Attachment A for a period of 45 days, during all times of day and night. This information  
4 includes: all available E-911 Phase II data, GPS data, latitude-longitude data, and other  
5 precise location information, as well as all data about which “cell towers” (i.e., antenna  
6 towers covering specific geographic areas) and “sectors” (i.e., faces of the towers) received  
7 a radio signal from the cellular telephone(s) or account(s) described in Attachment A.

8           b. The physical address and coverage maps of cell towers used by the  
9 Target Cell Phone.

10           To the extent that the location information described in the previous paragraphs  
11 (hereinafter, “Location Information”) is within the possession, custody, or control of  
12 Verizon, Verizon is required to disclose the Location Information to the government  
13 pursuant to this warrant. In addition, pursuant to 18 U.S.C. §§ 3123(b)(2) and 3124(a)-(b),  
14 Verizon must furnish the government all information, facilities, and technical assistance  
15 necessary to accomplish the collection of the Location Information unobtrusively and with  
16 a minimum of interference with Verizon’s services. The government shall compensate  
17 Verizon for reasonable expenses incurred in furnishing such facilities or assistance.

18           **II. Section II: Information to Be Seized by the Government**

19           6. All information described above in Section I that will assist in arresting  
20 Natasha Halani PARKHILL, who was charged with violating Conspiracy to Distribute  
21 Fentanyl and Possession of Fentanyl with Intent to Distribute, all in violation of 21 USC  
22 §§ 841(a)(1) and 846, and is the subject of an arrest warrant issued on April 12, 2023, and  
23 is a “person to be arrested” within the meaning of Federal Rule of Criminal Procedure  
24 41(c)(4).

25           7. All non-content subscriber/account information provided pursuant to 18  
26 U.S.C. § 2703(c).

27           8. All non-content dialing, routing, addressing, and signaling information  
28 provided pursuant to 18 U.S.C. §§ 3121-3127.



1           9.       Location Information regarding the Target Cell Phone.

2           Law enforcement personnel (who may include, in addition to law enforcement  
3 officers and agents, attorneys for the government, attorney support staff, agency personnel  
4 assisting the government in this investigation, and outside technical experts under  
5 government control) are authorized to review the records produced by Verizon in order to  
6 locate the things particularly described in this Warrant.